

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE
ATTACHED EXHIBITS:

**JOINT MOTION TO DISMISS DEFENDANT
C.R. BARD, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibits A-Q and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and Bard jointly move the court to dismiss Bard as a defendant in these actions with prejudice, and terminate Bard from the docket in the actions, parties to bear their own costs. Other Defendants remain in these actions, and Plaintiffs will continue to prosecute these actions against them.

Respectfully:

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Dated: May 11, 2018

EXHIBIT A – ANAPOL WEISS

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:12-cv-05328 | Jennifer Emerich v. C.R. Bard, Inc., et al. |

EXHIBIT B – AYLSTOCK, WITKIN, KREIS & OVERHOLTZ, PLLC

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:12-cv-00341 | Helen M. Brown and Robert E. Ruttkay v. C.R. Bard, Inc., et al. |
| 2:12-cv-08023 | Debra A. Johnson v. C.R. Bard, Inc., et al. |
| 2:13-cv-02850 | Christy Marie Hannon and Ronny Jay Hannon v. C.R. Bard, Inc., et al. |
| 2:13-cv-25557 | Barbara Kay Broussard v. C.R. Bard, Inc., et al. |
| 2:13-cv-26703 | Candice Holder v. C.R. Bard, Inc., et al. |
| 2:14-cv-08002 | Bridget K. Harper-Leonard v. C.R. Bard, Inc., et al. |
| 2:14-cv-08207 | Linda C. Sine and David M. Sine v. C.R. Bard, Inc., et al. |
| 2:14-cv-08835 | Shirley E. Williams v. C.R. Bard, Inc., et al. |
| 2:14-cv-26701 | Sue A. Mackin v. C.R. Bard, Inc., et al. |
| 2:15-cv-06181 | Joy Lewter v. C.R. Bard, Inc., et al. |
| 2:15-cv-07642 | Lyndia A. McCool v. C.R. Bard, Inc., et al. |
| 2:15-cv-07658 | Jaime Ann Ennis v. C.R. Bard, Inc., et al. |
| 2:16-cv-01937 | Patricia White v. C.R. Bard, Inc., et al. |

EXHIBIT C – BARON & BUDD

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:14-cv-26042 | Linda Reeves and Herman Reeves v. C.R. Bard, Inc., et al. |

EXHIBIT D – BIGHORN LAW

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:16-cv-06050 | Bambi Lynn McNail v. C.R. Bard, Inc., et al. |

EXHIBIT E – BROWN & CROUPPEN

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:15-cv-14491 | Judith L. Johnson v. C.R. Bard, Inc., et al. |

EXHIBIT F – CELLINO & BARNES

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:15-cv-04054 | Ines Velez-Vega v. C.R. Bard, Inc., et al. |

EXHIBIT G – COHEN & MALAD

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:14-cv-16804 | Roseanna Drummond and Mark Drummond v. C.R. Bard, Inc., et al. |

EXHIBIT H – HARRISON DAVIS STEAKLEY MORRISON

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:13-cv-12287 | Jackie Shrode v. C.R. Bard, Inc., et al. |

EXHIBIT I – HEARD ROBINS CLOUD & BLACK

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:13-cv-11098 | Lisa Ann Shank and Meade Shank v. C.R. Bard, Inc., et al. |
| 2:14-cv-17637 | Janice Smith v. C.R. Bard, Inc., et al. |
| 2:14-cv-18562 | Phyllis Willdermood and William Willdermood, Sr. v. C.R. Bard, Inc., et al. |
| 2:14-cv-21212 | Joy J. Gonzales v. C.R. Bard, Inc., et al. |
| 2:14-cv-22463 | Iris Putnam v. C.R. Bard, Inc., et al. |

EXHIBIT J – LEWIS SAUL & ASSOCIATES

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:16-cv-00081 | Karen Mullane v. C.R. Bard, Inc., et al. |

EXHIBIT K – LOPEZ MCHUGH

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:12-cv-08964 | Eri Hensley and Randall Hensley v. C.R. Bard, Inc., et al. |
| 2:13-cv-28634 | Linda Turner and Kenneth Faulk v. C.R. Bard, Inc., et al. |

EXHIBIT L – MARLIN & SALTZMAN

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:14-cv-00381 | Betty Lucas and Peter Lucas v. C.R. Bard, Inc., et al. |

EXHIBIT M – MILLER WEISBROD

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:13-cv-08360 | Kimberly Sells v. C.R. Bard, Inc., et al. |
| 2:13-cv-10156 | Marjorie Miller v. C.R. Bard, Inc., et al. |
| 2:13-cv-11726 | Ignacia G. Sandoval v. C.R. Bard, Inc., et al. |
| 2:13-cv-20825 | Debra Walden v. C.R. Bard, Inc., et al. |
| 2:13-cv-27698 | Patricia Cranmer v. C.R. Bard, Inc., et al. |
| 2:16-cv-01366 | Pamela S. Hanko v. C.R. Bard, Inc., et al. |

EXHIBIT N – NASTLAW

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:14-cv-16815 | Rachel Pearson and Terry Pearson v. C.R. Bard, Inc., et al. |

EXHIBIT O – NEMEROFF LAW FIRM

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:14-cv-21660 | Susan K. Horner and Bruce G. Horner v. C.R. Bard, Inc., et al. |

EXHIBIT P – SOLIS LAW FIRM

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|---|
| 2:13-cv-18144 | Sonia Peinado and Isidro Peinado v. C.R. Bard, Inc., et al. |
| 2:13-cv-22601 | Cholonda Allen v. C.R. Bard, Inc., et al. |

EXHIBIT Q – WATTS GUERRA CRAFT

| CIVIL ACTION NUMBER (listed numerically in ascending order) | CASE NAME |
|--|--|
| 2:13-cv-22514 | Janet Mottice v. C.R. Bard, Inc., et al. |

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2018, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.